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CHASOM BROWN, *et al.*, individually and
on behalf of all similarly situated,
Plaintiffs,
v.
GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK
[PROPOSED] ORDER GRANTING MOTION TO SEAL
Judge: Hon. Yvonne Gonzalez Rogers

[PROPOSED] ORDER

2 Before the Court is Plaintiffs' Administrative Motion to File Under Seal Portions of
3 Plaintiffs' Opposition to Google's Motion for Summary Judgment (Dkt. 924) ("Motion"). Having
4 considered the Motion, supporting declarations, and other papers on file, and compelling reasons
5 having been found, the Court **ORDERS** as follows:

| Document or Portion of Document Sought to be Sealed | Evidence Offered in Support of Sealing | Ruling |
|--|--|--------|
| Plaintiffs' Opposition to Google's Motion for Summary Judgment (Dkt. 924-3) Pages 2:6, 9:1, 9:20, 9:25-27, 18:2, 18:20 | Margolies Declaration ¶¶ 4-5 | |
| Plaintiffs' Responsive Separate Statement Regarding Material Facts (Dkt. 924-4) Pages 8:26, 9:15, 10:14, 11:17, 15:16, 18:9, 21:4, 22:15, 23:14, 25:4, 29:9, 32:18 | Margolies Declaration ¶¶ 4-5 | |
| Exhibit 8 to Mao Declaration - 6/7/22 Rebuttal to Zervas and Supplemental Report of Jonathan Hochman Pages 8-18, 20-23, 26, 28, 30-31, 33, 35-37, 40, 42-44, 48-50, 66-67. 69, 71-74 Appendix A (Elec) - Seal Entirely Appendix B (Elec) - Seal Entirely Appendix C (Elec) - Seal Entirely Appendix D (Elec) - Seal Entirely Appendix E (Elec) - Seal Entirely Appendix F (Elec) - Seal Entirely Appendix G (Elec) - Seal Entirely Appendix H (Elec) - Seal Entirely Appendix I (Elec) - includes mp4 and .saz files - AEO by Plaintiffs Appendix J - Seal Entirely Appendix K (Elec) - Seal Entirely Exhibit A (Elec) - Seal Entirely by Plaintiffs | Margolies Declaration ¶¶ 4-5 | |

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| 1 | Exhibit B (Elec) - Sealed Entirely by Plaintiffs | | |
| 2 | Exhibit 9 to Mao Declaration - GOOG-CABR-00501220 | Margolies Declaration ¶¶ 4-5 | |
| 3 | Pages -1221, -1222, -1224, -1225 | | |
| 4 | Exhibit 10 to Mao Declaration - GOOG-BRWN-00613409 | Margolies Declaration ¶¶ 4-5 | |
| 5 | Page -409 | | |
| 6 | Exhibit 11 to Mao Declaration - GOOG-BRWN-00613409 | Margolies Declaration ¶¶ 4-5 | |
| 7 | Pages -484, -487 | | |
| 8 | Exhibit 13 to Mao Declaration - GOOG-BRWN-00032906 | Margolies Declaration ¶¶ 4-5 | |
| 9 | Seal Entirely | | |
| 10 | Exhibit 17 to Mao Declaration - 6/7/22 Expert Rebuttal Report of Bruce Schneier; Rebuttal of Expert Georgios Zervas | Margolies Declaration ¶¶ 4-5 | |
| 11 | Pages 11-14, 21, 23-25 | | |
| 12 | Exhibit 18 to Mao Declaration - 2/14/23 Glenn Berntson Depo. Trans. Excerpts | Margolies Declaration ¶¶ 4-5 | |
| 13 | Page 38:9 | | |
| 14 | Exhibit 20 to Mao Declaration - 2/18/22 Rory McClelland Depo. Trans. Excerpts | Margolies Declaration ¶¶ 4-5 | |
| 15 | Pages 124:5, 132:15, 133:17, 133:20-134:4, 134:15 | | |
| 16 | Exhibit 22 to Mao Declaration - GOOG-BRWN-00490767 | Margolies Declaration ¶¶ 4-5 | |
| 17 | Seal Entirely | | |
| 18 | Exhibit 25 to Mao Declaration - 4/22/22 Expert Report of Michael Lasinski | Margolies Declaration ¶¶ 4-5 | |
| 19 | Pages: TOC, 1-2, 7, 9-16, 18-59, 65-67, 73-78, 80-82 | | |
| 20 | Lasinski Schedules: PDF Pages 107-178, 180-184, 186-188, 190, 192, 196, | | |
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| 1 | 199-203, 205-214, 216-230, 232, 235-239, 241-297 | | |
| 2 | Exhibit 26 to Mao Declaration - 12/20/22 QE Letter to BSF | Margolies Declaration ¶¶ 4-5 | |
| 3 | Pages 1-2 | | |
| 4 | Exhibit 32 to Mao Declaration - GOOG-BRWN-0042388 | Margolies Declaration ¶¶ 4-5 | |
| 5 | Pages -404, -408, -410 | | |
| 6 | Exhibit 37 to Mao Declaration - GOOG-BRWN-00047341 | Margolies Declaration ¶¶ 4-5 | |
| 7 | Page -344 | | |
| 8 | Exhibit 38 to Mao Declaration - GOOG-CABR-04431207 | Margolies Declaration ¶¶ 4-5 | |
| 9 | Seal Entirely | | |
| 10 | Exhibit 41 to Mao Declaration - GOOG-BRWN-00477510 | Margolies Declaration ¶¶ 4-5 | |
| 11 | Seal Entirely | | |
| 12 | Exhibit 42 to Mao Declaration - GOOG-CABR-00084985 | Margolies Declaration ¶¶ 4-5 | |
| 13 | Page -5043 | | |
| 14 | Exhibit 44 to Mao Declaration - GOOG-CABR-04261880 | Margolies Declaration ¶¶ 4-5 | |
| 15 | Page -1880 | | |
| 16 | Exhibit 45 to Mao Declaration - GOOG-BRWN-00410884 | Margolies Declaration ¶¶ 4-5 | |
| 17 | Pages -0884, -0885, -0886, PDF pages 4-5 | | |
| 18 | Exhibit 46 to Mao Declaration - GOOG-CABR-05145513 | Margolies Declaration ¶¶ 4-5 | |
| 19 | Seal Entirely | | |
| 20 | Exhibit 47 to Mao Declaration - GOOG-CABR-03923580 | Margolies Declaration ¶¶ 4-5 | |
| 21 | Pages -3580-584, PDF page 6 | | |
| 22 | Exhibit 48 to Mao Declaration - GOOG-BRWN-00410884 | Margolies Declaration ¶¶ 4-5 | |
| 23 | Pages -0884, -0885, -0886, PDF pages 4-5 | | |
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| 1 | Exhibit 49 to Mao Declaration - GOOG-BRWN-00475063 | Margolies Declaration ¶¶ 4-5 | |
| 2 | Pages -5063-5064, -5066 | | |
| 3 | Exhibit 51 to Mao Declaration - GOOG-BRWN-00686207 | Margolies Declaration ¶¶ 4-5 | |
| 4 | Seal Entirely | | |
| 5 | Exhibit 52 to Mao Declaration - GOOG-BRWN-00164056 | Margolies Declaration ¶¶ 4-5 | |
| 6 | Seal Entirely | | |
| 7 | Exhibit 53 to Mao Declaration - GOOG-BRWN-00047341 | Margolies Declaration ¶¶ 4-5 | |
| 8 | Page -344 | | |
| 9 | Exhibit 54 to Mao Declaration - GOOG-BRWN-00047341 | Margolies Declaration ¶¶ 4-5 | |
| 10 | Page -344 | | |
| 11 | Exhibit 55 to Mao Declaration - GOOG-BRWN-00056809 | Margolies Declaration ¶¶ 4-5 | |
| 12 | Seal Entirely | | |
| 13 | Exhibit 56 to Mao Declaration - 10/11/22 Trans. of Proceedings Excerpts | Margolies Declaration ¶¶ 4-5 | |
| 14 | Page 14:18-19 | | |
| 15 | Exhibit 60 to Mao Declaration - GOOG-CABR-03827263 | Margolies Declaration ¶¶ 4-5 | |
| 16 | Page -7263 | | |
| 17 | Exhibit 63 to Mao Declaration - GOOG-BRWN-00465037 | Margolies Declaration ¶¶ 4-5 | |
| 18 | Seal Entirely | | |
| 19 | Exhibit 66 to Mao Declaration - GOOG-CABR-04746153 | Margolies Declaration ¶¶ 4-5 | |
| 20 | Seal Entirely | | |
| 21 | Exhibit 69 to Mao Declaration - GOOG-CABR-05836882 | Margolies Declaration ¶¶ 4-5 | |
| 22 | Seal Entirely | | |
| 23 | Exhibit 70 to Mao Declaration - GOOG-CABR-05150754 | Margolies Declaration ¶¶ 4-5 | |
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| 1 | Seal Entirely | |
| 2 | Exhibit 71 to Mao Declaration - GOOG-BRWN-00166653 | Margolies Declaration ¶¶ 4-5 |
| 3 | Seal Entirely | |
| 4 | Exhibit 72 to Mao Declaration - GOOG-BRWN-00164056 | Margolies Declaration ¶¶ 4-5 |
| 5 | Seal Entirely | |
| 6 | Exhibit 73 to Mao Declaration - GOOG-BRWN-00406065 | Margolies Declaration ¶¶ 4-5 |
| 7 | Pages -6065-6069 | |
| 8 | Exhibit 77 to Mao Declaration - GOOG-BRWN-00147864 | Margolies Declaration ¶¶ 4-5 |
| 9 | PDF Page 2 | |
| 10 | Exhibit 79 to Mao Declaration - GOOG-BRWN-00047399 | Margolies Declaration ¶¶ 4-5 |
| 11 | Seal Entirely | |
| 12 | Exhibit 80 to Mao Declaration - GOOG-BRWN-00140297 | Margolies Declaration ¶¶ 4-5 |
| 13 | Pages -0311-313, -0315-319, -0323, - 0325, -0327-329 | |
| 14 | Exhibit 81 to Mao Declaration - GOOG-CABR-00501220 | Margolies Declaration ¶¶ 4-5 |
| 15 | Pages -1221, -1222, -1224, -1225 | |
| 16 | Exhibit 82 to Mao Declaration - GOOG-BRWN-00176477 | Margolies Declaration ¶¶ 4-5 |
| 17 | Pages -6478, -6479, -6480 | |
| 18 | Exhibit 84 to Mao Declaration - GOOG-BRWN-00067645 | Margolies Declaration ¶¶ 4-5 |
| 19 | Seal Entirely | |
| 20 | Exhibit 85 to Mao Declaration - GOOG-BRWN-00182492 | Margolies Declaration ¶¶ 4-5 |
| 21 | Page -2492 | |
| 22 | Exhibit 86 to Mao Declaration - GOOG-BRWN-00182492 | Margolies Declaration ¶¶ 4-5 |
| 23 | Pages -7391, -7395, -7396, -7397, - 7398 | |
| 24 | Exhibit 88 to Mao Declaration - | Margolies Declaration ¶¶ 4-5 |
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| 1 | GOOG-CABR-04739841 | | |
| 2 | Seal Entirely | | |
| 3 | Exhibit 92 to Mao Declaration - GOOG-BRWN-00047390 | Margolies Declaration ¶¶ 4-5 | |
| 4 | Pages -7391, -7395, -7396, -7397, - | | |
| 5 | 7398 | | |
| 6 | Exhibit 93 to Mao Declaration - GOOG-BRWN-00388293 | Margolies Declaration ¶¶ 4-5 | |
| 7 | Page -8295 | | |
| 8 | Exhibit 94 to Mao Declaration - GOOG-BRWN-00176477 | Margolies Declaration ¶¶ 4-5 | |
| 9 | Pages -6478, -6479, -6480 | | |
| 10 | Exhibit 95 to Mao Declaration - GOOG-BRWN-00202175 | Margolies Declaration ¶¶ 4-5 | |
| 11 | Seal Entirely | | |
| 12 | Exhibit 96 to Mao Declaration - GOOG-BRWN-00433503 | Margolies Declaration ¶¶ 4-5 | |
| 13 | Seal Entirely | | |
| 14 | Exhibit 97 to Mao Declaration - GOOG-BRWN-00391231 | Margolies Declaration ¶¶ 4-5 | |
| 15 | Pages -231, -232 | | |
| 16 | Exhibit 105 to Mao Declaration - Hochman Opening Report Exhibit B (submitted by Hard Drive) | Margolies Declaration ¶¶ 4-5 | |
| 17 | Seal Entirely | | |
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| 23 | SO ORDERED. | | |
| 24 | DATED: _____ | | |
| 25 | | HON. YVONNE GONZALEZ ROGERS | |
| 26 | | United States District Judge | |
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